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**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

BCB CHEYENNE LLC d/b/a BISON)
 BLOCKCHAIN, a Wyoming limited liability)
 Company)

Plaintiffs)

v.)

Civil No. 23-CV-79

MINEONE WYOMING DATA CENTER,)
 LLC, a Delaware limited liability company;)
 MINEONE PARTNERS LLC, a Delaware)
 limited liability company; TERRA CRYPTO)
 INC., a Delaware corporation; BIT ORIGIN,)
 LTD, a Cayman Island Company;)
 SONICHASH LLC, a Delaware limited)
 liability company; and JOHN DOES 1-20,)
 related persons and companies who control)
 or direct some or all of the named Defendants,)

Defendants.)

MOTION FOR EXHIBIT TO BE FILED AS A NON-PUBLIC DOCUMENT

COMES NOW Plaintiff BCB Cheyenne LLC d/b/a Bison Blockchain, through its counsel,
 and hereby moves this Court for an Order allowing “**Exhibit A**” to *Plaintiff’s First Amended
 Complaint for Breach of Contract, Anticipatory Repudiation of Contract, Intentional Interference*

with Contractual Relations, Alter Ego Liability, Enterprise Liability, and Lost Profits and Money Damages (“*Amended Complaint*”) to be filed as a non-public document (“*Motion*”). In support of this *Motion*, Plaintiff submits the following:

Plaintiff proposes to file and serve “**Exhibit A**,” a proprietary business document, as evidentiary support for its *Amended Complaint* filed on September 30, 2023 (Doc 50). This document – titled “Service Framework Agreement” – contains and describes confidential and proprietary information that is to be disclosed only to the parties to the Agreement. Further, paragraph 12 of the Service Framework Agreement defines the confidentiality required of the parties to the Agreement.

For these reasons, “**Exhibit A**” to the *Amended Complaint* should not be available to the public. The Plaintiff has an interest in this proprietary information remaining confidential and available only to the Court and the Parties in this lawsuit.

The “**Exhibit A**” that was filed with the *Amended Complaint* on 9/30/23 as Doc 50-1 was a “placeholder” for the Service Framework Agreement should the Court grant this *Motion*.

WHEREFORE, for the reasons set forth above, Plaintiff respectfully requests an Order from this Court allowing “**Exhibit A**” of the *Amended Complaint* to be filed supplementally as a non-public document pursuant to U.S.D.C.L.R. 5.1(g).

Respectfully submitted this 5th day of October 2023.

BCB CHEYENNE LLC d/b/a
BISON BLOCKCHAIN,
Plaintiff

By: /s/ Patrick J. Murphy
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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing document was delivered to the Court via the CM/ECF System and served upon counsel via CM/ECF electronic transmission this 5th day of October 2023.

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- ☐ Overnight Delivery
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